

### **UNITED STATES EC** SECURITIES AND EXCHANGE COMMISSION

Section Washington, D.C. 20549

FEB 28 2012

ANNUAL AUDITED REPORT **FORM X-17A-5** 

Washington, DC 123

**FACING PAGE** 



OMB APPROVAL

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April 30, 2013

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	01/01/11 MM/DD/YY	AND ENDING _	12/31/11 MM/DD/YY
A. REGI	STRANT IDENTIFICA	ATION	
NAME OF BROKER-DEALER:			OFFICIAL USE ONLY
VCA Securities, LP (formerly Bluffview Sec	eurities, LP)		
ADDRESS OF PRINCIPAL PLACE OF BUSINES	SS: (Do not use P.O. Box	No.)	FIRM ID. NO.
2000 McKinney, Suite 600			
	(No. and Street)		
Dallas	TX		75201
(City)	(State)	· · · · · · · · · · · · · · · · · · ·	(Zip Code)
B. ACCO	UNTANT IDENTIFIC		(Area Code – Telephone No.)
DIDENTIFICATION OF THE PROPERTY OF THE PROPERT		ulia Damanak	
INDEPENDENT PUBLIC ACCOUNTANT whose	opinion is contained in	uns Report	
CF & Co., L.L.P.	**********		
(Name – if	individual, state last, first, middle	e name)	
8750 N. Central Expressway, Suite 300	Dallas	TX	75231-6464
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			
Public Accountant	•		
Accountant not resident in United St	tates or any of its possess	ions.	
	FOR OFFICIAL USE ONLY	,	

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).

> Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.



## **OATH OR AFFIRMATION**

I, Jeffrey G	. Rupp, swear (or affirm) that, to the best of
my knowledge	and belief the accompanying financial statements and supporting schedules pertaining to the firm of
VCA Securiti	• • •
are true and co	orrect. I further swear (or affirm) that neither the Partnership nor any partner, proprietor, principal ctor has any proprietary interest in any account classified solely as that of a customer, except as
	KRIS HUMPHREY My Commission Expires August 9, 2015  Fus. LL  Title
\$	Notary Public
This re	eport** contains (check all applicable boxes):
	Facing page.
X (b)	Statement of Financial Condition.
X (c)	Statement of Income (Loss).
X (d)	Statement of Cash Flows
X (e)	Statement of Changes in Stockholders' Equity or partners' or Sole Proprietor's Capital.
Y (1)	Statement of Changes in Liabilities Subordinated to Claims of Creditors.
X (g)	Computation of Net Capital.
X (n)	Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.  Information Relating to the Possession or control Requirements Under Rule 15c3-3.
	A Reconciliation, including appropriate explanation, of the Computation of Net Capital Under Rule 15c3-1 and the
X (j)	Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
☐ (k)	A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of con-
	solidation.
	An Oath or Affirmation.
X (m	) A copy of the SIPC Supplemental Report.
(n)	A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.
X  (o)	Independent auditor's report on internal control

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

Report Pursuant to Rule 17a-5(d)

For the Year Ended December 31, 2011

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8750 N. Central Expressway Suite 300 Dallas, TX 75231-6464 972.387.4300 800.834.8586 972.960.2810 fax

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#### INDEPENDENT AUDITOR'S REPORT

To the Partners of VCA Securities, LP

We have audited the accompanying statement of financial condition of VCA Securities, LP (the "Partnership") as of December 31, 2011, and the related statements of income (loss), changes in partners' capital, changes in liabilities subordinated to claims of general creditors, and cash flows for the year then ended that you are filing pursuant to Rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Partnership's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of VCA Securities, LP as of December 31, 2011, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The supplementary information contained in Schedules I and II required by Rule 17a-5 under the Securities Exchange Act of 1934 is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion the information is fairly stated in all material respects in relation to the financial statements as a whole.

CF 16, UP CF & Co., L.L.P.

Dallas, Texas February 24, 2012

# VCA SECURITIES, LP Statement of Financial Condition December 31, 2011

### **ASSETS**

Cash Receivable from broker-dealer and clearing organizations Prepaid and other assets	\$ 134,988 209,167 7,643
Total Assets	\$ 351,798
LIABILITIES AND PARTNERS' CAPITAL	
Liabilities: Accounts payable and accrued liabilities State income taxes payable	\$ 20,137 940
Total Liabilities	21,077
Partners' capital	330,721
	\$ 351,798

## VCA SECURITIES, LP Statement of Income (Loss)

## For the Year Ended December 31, 2011

Revenue:	
Commissions	\$ 1,320,052
Other revenue	173,737
	1,493,789
Expenses:	
Operating expense	1,338,789
Clearance fees	216,350
Registration fees	32,270
Professional fees and other	20,180
	1,607,589
Loss before income taxes	(113,800)
Provision (benefit) for state income taxes	940
Net Loss	\$ (114,740)

## Statement of Changes in Partners' Capital For the Year Ended December 31, 2011

Balance, December 31, 2010	\$ 105,330
Capital contributions	340,131
Net loss	(114,740)
Balance, December 31, 2011	\$ 330,721

## Statement of Changes in Liabilities Subordinated

## to Claims of General Creditors

## For the Year Ended December 31, 2011

Balance, December 31, 2010	\$ 
Increases	
Decreases	 
Balance, December 31, 2011	\$ 

## Statement of Cash Flows

## For the Year Ended December 31, 2011

Cash flows from operating activities	
Net loss	\$ (114,740)
Adjustments to reconcile net loss to net	
cash provided (used) by operating activities:	
Change in assets and liabilities:	
Decrease in receivable from broker-dealer and clearing organizations	81,627
Decrease in prepaid and other assets	422
Decrease in accounts payable and accrued liabilities	(3,131)
Increase in due to related parties	41,954
Decrease in state income taxes payable	 (1,185)
Net cash provided (used) by operating activities	 4,947
Cash flows from investing activities	
Net cash provided (used) by investing activities	 
Cash flows from financing activities	
Capital contributions	 125,000
Net cash provided (used) by financing activities	125,000
Net increase in cash	129,947
Beginning cash	 5,041
Ending cash	\$ 134,988
Supplemental schedule of cash flow information	
Cash paid for:	
Interest	\$ 
Income taxes	\$ 
Supplemental schedule of non-cash investing activities	
Amounts due to related parties contributed to Partners' capital	\$ 215,131

#### Note 1 - Description of Business and Summary of Significant Accounting Policies

VCA Securities, LP (formerly Bluffview Securities, LP) (the "Partnership") was formed under the laws of the State of Texas in January 2004. The Partnership is managed by 575 Partners, LLC (the "General Partner"). The Partnership received approval to operate and conduct business as a broker-dealer on July 26, 2004. The Partnership is a broker-dealer in securities registered with the Securities and Exchange Commission ("SEC") under (SEC) Rule 15c3-3(k)(2)(i) and a member of the Financial Industry Regulatory Authority ("FINRA").

The Partnership's primary operation is to provide comprehensive brokerage and investment banking services to its client base including soliciting and effecting transactions in equities, fixed income, mutual funds, options, municipals, and various other investment products. The Partnership conducts trading for its own account on a "riskless principal" basis.

#### Revenue and Expense Recognition from Securities Transactions

Commission revenue as well as related clearance fees are recorded on a trade date basis as securities transactions occur. Principal transactions and the related revenues are recorded on the trade date basis.

#### Receivables from Broker/Dealers

Receivables from broker/dealers and clearing organizations are generally collected in full in the month following their accrual. As such, management has not recorded an allowance for doubtful accounts on theses receivables. Management records an allowance for bad debts based on a collectability review of specific accounts. Any receivable deemed uncollectable are written off against the allowance.

#### **Income Taxes**

The Partnership does not record a provision for federal income taxes because the partners report their share of the Partnership's income or loss on their federal income tax returns. The financial statements reflect the Partnership's transactions without adjustment, if any, required for federal income tax purposes.

#### Note 1 - Description of Business and Summary of Significant Accounting Policies, continued

#### Income Taxes, continued

Any potential interest and penalty associated with a tax contingency, should one arise, would be included as a component of income tax expense in the period in which the assessment arises.

#### **Use of Estimates**

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

#### Note 2 - Net Capital Requirements

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities Exchange Act of 1934, the Partnership is required to maintain a minimum net capital, as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis.

At December 31, 2011, the Partnership had net capital of approximately \$319,078 and net capital requirements of \$50,000. The Partnership's ratio of aggregate indebtedness to net capital was .07 to 1. The Securities and Exchange Commission permits a ratio of no greater than 15 to 1.

Capital distributions to partners can be made under a capital distribution policy approved by the General Partner. Periodic distributions are made to enable partners to pay federal income taxes on Partnership profits, among other purposes.

### Note 3 - <u>Possession or Control Requirements</u>

The Partnership holds no customer funds or securities. There were no material inadequacies in the procedures followed in adhering to the exemptive provisions of (SEC) Rule 15c3-3(k)(2)(ii) by promptly transmitting all customer funds and securities to the clearing broker who carries the customer accounts.

#### Note 4 - Income Taxes

The Partnership files income tax returns in the U.S. federal jurisdiction and files its Texas Franchise Tax return as part of a combined group. The Partnership's federal income tax returns generally remain subject to examination by the Internal Revenue Service for three years from the date the return is due, including extensions. The Partnership's Texas Franchise Tax returns generally remain subject to examination by the Texas Comptroller of Public Accounts for four years from the date the tax becomes due and payable.

#### Note 5 - Off-Balance Sheet Risk

Pursuant to clearance agreements, the Partnership introduces all of its securities transactions to clearing brokers on a fully-disclosed basis. All of the customers' money balances and long and short security positions are carried on the books of the clearing brokers. In accordance with the clearance agreements, the Partnership has agreed to indemnify the clearing brokers for losses, if any, which the clearing brokers may sustain from carrying securities transactions introduced by the Partnership. In accordance with industry practice and regulatory requirements, the Partnership and the clearing brokers monitor collateral on the customers' accounts.

At December 31, 2011, management of the Partnership had not been notified by the clearing broker-dealer, nor were they otherwise aware, of any potential losses relating to this indemnification.

In addition, the receivables from the clearing brokers are pursuant to these clearance agreements and includes a clearing deposit of \$100,000.

#### Note 6 - Concentrations of Credit Risk

In the normal course of business, the Partnership's customer activities involve the execution, settlement, and financing of various customer securities transactions. These activities may expose the Partnership to off-balance-sheet risk in the event the customer or other broker is unable to fulfill its contracted obligations and the Partnership has to purchase or sell the financial instrument underlying the contract at a loss.

The Partnership maintains its cash balances in various financial institutions. These balances are insured by the Federal Deposit Insurance Corporation up to the federally insured limits.

#### Note 7 - Related Party Transactions

Pursuant to an expense sharing agreement dated May 17, 2004, between the Partnership and View Capital Advisors, LLC, ("Affiliate"), the Partnership is charged a pro-rata share of various operating expenses, including but not limited to payroll and benefits, rent, utilities and the use of furniture and equipment. For the year ended December 31, 2011, the Partnership had expensed approximately \$1,333,831 related to these charges.

The Partnership and its Affiliate are under common control and the existence of that control may create operating results and financial position different than if the companies were autonomous.

Supplementary Information

Pursuant to Rule 17a-5 of the

Securities Exchange Act of 1934

as of

December 31, 2011

### Schedule I

## VCA SECURITIES, LP

## Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2011

## Computation of Net Capital

Total partners' capital qualified for net capital		\$ 330,721
Add: Other deductions or allowable credits		 <del></del>
Total capital and allowable subordinated liabilities		330,721
Deductions and/or charges Non-allowable assets:		
Prepaid and other assets	\$ 7,643	(7,643)
Other charges: Excess fidelity bond charge		(4,000)
Net capital before haircuts on securities positions		319,078
Haircuts on securities (computed, where applicable, pursuant to Rule 15c3-1(f)):		 
Net capital		\$ 319,078
Aggregate Indebtedness		
Items included in statement of financial condition Accounts payable and accrued liabilities State income taxes payable		\$ 20,137 940
Total aggregate indebtedness		\$ 21,077

## Schedule I (continued)

## VCA SECURITIES, LP

## Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2011

## Computation of Basic Net Capital Requirement

Minimum net capital required (6 2/3% of total aggregate indebtedness)	\$	1,405
Minimum dollar net capital requirement of reporting broker or dealer	_\$	50,000
Minimum net capital requirement (greater of two minimum requirement amounts)	\$	50,000
Net capital in excess of minimum required	\$	269,078
Excess net capital at 1000%	_\$	316,969
Ratio: Aggregate indebtedness to net capital	0.	07 to 1
Reconciliation with Partnership's Computation		
The following serves to reconcile material differences in the computation of net Rule 15c3-1 from the Partnership's computation:	capit	al under
Net capital per Partnership's (unaudited) FOCUS IIA Report Adjustments:	\$	318,528
Receivable from broker-dealer and clearing organizations		6,982
Accounts payable and accrued expenses		(1,492)
State income taxes payable		(940)
Excess fidelity bond charge	<del></del>	(4,000)
Net capital per audited report		319,078

#### Schedule II

### VCA SECURITIES, LP

Computation for Determination of Reserve Requirements Under
Rule 15c3-3 of the Securities and Exchange Commission
As of December 31, 2011

### **Exemptive Provisions**

The Partnership has claimed an exemption from Rule 15c3-3 under section (k)(2)(ii), in which all customer transactions are cleared through another broker-dealer on a fully disclosed basis.

Partnership's clearing firm: J.P. Morgan Clearing Corporation

Independent Auditor's Report

On Internal Control

Required By SEC Rule 17a-5

For the Year Ended December 31, 2011



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## INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL REQUIRED BY SEC RULE 17a-5

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To the Partners of VCA Securities, LP

In planning and performing our audit of the financial statements and supplemental information of VCA Securities, LP (the "Partnership"), as of and for the year ended December 31, 2011 in accordance with auditing standards generally accepted in the United States of America, we considered the Partnership's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Partnership's internal control. Accordingly, we do not express an opinion on the effectiveness of the Partnership's internal control.

Also, as required by Rule 17a-5(g)(1) of the Securities Exchange Commission (SEC), we have made a study of the practices and procedures followed by the Partnership including consideration of control activities for safeguarding securities. This study included tests of compliance with such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness and net capital under Rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Partnership does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Partnership in any of the following:

- 1. Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by Rule 17a-13
- 2. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System

The management of the Partnership is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Partnership has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis.

A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

A material weakness is a deficiency, or combination of significant deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Partnership's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and was not designed to identify all deficiencies in internal control that might be material weaknesses and therefore, there can be no assurance that all material weaknesses have been identified. We did not identify any deficiencies in internal control and control activities for safeguarding securities that we consider to be material weaknesses, as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Partnership's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2011, to meet the SEC's objectives.

This report is intended solely for the information and use of the Partners, management, the SEC, the Financial Industry Regulatory Authority, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

CF & Co., L.L.P.

CF 16, UP

Dallas, Texas February 24, 2012 Report on

The SIPC Annual Assessment

Required By SEC Rule 17a-5

Year Ended December 31, 2011



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## INDEPENDENT ACCOUNTANT'S REPORT ON THE SIPC ANNUAL ASSESSMENT REQUIRED BY SEC RULE 17a-5

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To the Partners of VCA Securities, LP

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2011, which were agreed to by VCA Securities, LP and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist you and the other specified parties in evaluating VCA Securities, LP's compliance with the applicable instructions of the Form SIPC-7. Management is responsible for VCA Securities, LP's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursements records entries (cash disbursements journal) noting no differences;
- 2. Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2011 with the amounts reported in Form SIPC-7 for the year ended December 31, 2011 noting no differences:
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers noting no differences; and
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

CF & Co., L.L.P.

Dallas, Texas February 24, 2012

# (33-REV 7/10)

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300 .....

SIPC-7 (33-REV 7/10)

General Assessment Reconciliation

For the fiscal year ended (Read carefully the instructions in your Working Copy before completing this Form)

TO BE FILED BY ALL SIPC 1. Name of Member, address, Designated Examining Autho		
purposes of the audit requirement of SEC Rule 17a-5:  066393 FINRA DEC  VCA SECURITIES LP 20*20 2000 MCKINNEY AVE 6TH FL  DALLAS TX 75201-1954		Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.  Name and telephone number of person to contact respecting this form.
<ul> <li>2. A. General Assessment (item 2e from page 2)</li> <li>B. Less payment made with SIPC-6 filed (exclude interest</li> <li>7-28-//</li> <li>Date Paid</li> </ul>	:)	\$ <u>2,638</u> (_1,145
Date Paid  C. Less prior overpayment applied		(0 -
D. Assessment balance due or (overpayment)		<u>1,493</u>
E. Interest computed on late payment (see instruction	E) fordays at 20% pe	
F. Total assessment balance and interest due (or over	payment carried forward)	\$ 1, 493
G. PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)	s <u>1,493</u>	
H. Overpayment carried forward	\$(	)
3. Subsidiaries (S) and predecessors (P) included in this formand the person by whom it is executed represent thereby that all information contained herein is true, correct and complete.	VCA Sec	Corporation, Partnership or other organization)
This form and the assessment payment is due 60 days for a period of not less than 6 years, the latest 2 years	after the end of the fiscal in an easily accessible pl	(Authorized Signature)  15 Partin, LLC - Carnel Partin (Title)  1 year. Retain the Working Copy of this form clace.
<b>H</b>	viewed cumentation	Forward Copy

## DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

RAL ASSESSMENT

Amounts for the fiscal period beginning 

, 20 1 / 20 1

(to page 1, line 2.A.)

		and ending the 31,	20 1
		Eliminate cents	
Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		\$ 1,493,780	<u> </u>
2b. Additions:  (1) Total revenues from the securities business of subsidiaries (excep predecessors not included above.	t foreign subsidiaries) and		
(2) Net loss from principal transactions in securities in trading accoun	ts.		
(3) Net loss from principal transactions in commodities in trading acco	unts.		<del></del>
(4) Interest and dividend expense deducted in determining item 2a.			
(5) Net loss from management of or participation in the underwriting o	r distribution of securities.		
(6) Expenses other than advertising, printing, registration fees and leg profit from management of or participation in underwriting or distri-	pal fees deducted in determining net bution of securities.		
(7) Net loss from securities in investment accounts.			
Total additions			
Deductions:     (1) Revenues from the distribution of shares of a registered open end investment trust, from the sale of variable annuities, from the busi advisory services rendered to registered investment companies or accounts, and from transactions in security futures products.	ness of insurance, from investment	177, 330	ł
(2) Revenues from commodity transactions.			
(3) Commissions, floor brokerage and clearance paid to other SIPC me securities transactions.	embers in connection with	216,350	)
(4) Reimbursements for postage in connection with proxy solicitation.			
(5) Net gain from securities in investment accounts.			
(6) 100% of commissions and markups earned from transactions in (i) (ii) Treasury bills, bankers acceptances or commercial paper that from issuance date.	certificates of deposit and mature nine months or less		Mark and the second
(7) Direct expenses of printing advertising and legal fees incurred in c related to the securities business (revenue defined by Section 16()	onnection with other revenue 9)(L) of the Act).		
(8) Other revenue not related either directly or indirectly to the securit (See Instruction C):	ies business.		
(Deductions in excess of \$100,000 require documentation)			
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA I Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	_ine 13,		
(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).	44,798	/	
Enter the greater of line (i) or (ii)		44,798	
Total deductions		438,482	<u></u>
2d. SIPC Net Operating Revenues		s 1,055, 307	
2e. General Assessment @ .0025		\$ 2,638	

December 31, 2011

Report Pursuant to Rule 17a-5(d)

